

THE HONORABLE BARBARA J. ROTHSTEIN

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
IN SEATTLE**

FRANSSEN CONDOMINIUM
ASSOCIATION OF APARTMENT
OWNERS, a Washington non-profit
corporation,

Plaintiff,

v.

COUNTRY MUTUAL INSURANCE
COMPANY, an Illinois company;
FARMINGTON CASUALTY COMPANY,
a Connecticut company; THE TRAVELERS
INDEMNITY COMPANY, a Connecticut
company; THE TRAVELERS INDEMNITY
COMPANY OF AMERICA, a Connecticut
company; and TRAVELERS CASUALTY
AND SURETY COMPANY, a Connecticut
company,

Defendants.

No. 2:21-cv-00295-BJR

STIPULATED MOTION AND
ORDER TO CONTINUE TRIAL
DATE AND PRE-TRIAL
DEADLINES

STIPULATED MOTION AND ORDER TO CONTINUE
TRIAL DATE AND PRE-TRIAL DEADLINES - 1

CASE NO. 2:21-cv-00295-BJR

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I. STIPULATION

Plaintiff Franssen Condominium Association of Apartment Owners (“the Association”) and Defendants Country Mutual Insurance Company, Farmington Casualty Company, the Travelers Indemnity Company, the Travelers Indemnity Company of America, and Travelers Casualty and Surety Company (collectively “the Parties”) jointly move the Court for an order setting a new trial date and new pre-trial deadlines. The Parties believe that good cause warrants a continuance here because: (1) complications arising from COVID-19 have previously delayed the Parties’ timely completion of discovery (*see Dkts. 33, 35, 37*); (2) in April 2022, the Association retained new co-counsel to assist in, among other things, the completion of discovery (*see Dkt. 40*); (3) the Association’s new counsel required time to familiarize themselves with the facts and issues in the case; (4) shortly after the appearance of new counsel, the parties conferred to develop a plan to timely complete the discovery process, during which the parties collectively identified 15 depositions to be taken; and (5) the currently-scheduled trial date conflicts with the pretrial deadlines and other trial preparation scheduled in a long-pending case being handled by the Association’s new counsel. The Parties therefore respectfully ask that the Court move the trial and pre-trial deadlines to the following:

<u>Event</u>	<u>Current Date</u>	<u>Proposed New Date</u>
Deadline to Take Expert Depositions	May 13, 2022	July 22, 2022
Deadline to File All Dispositive Motions	May 24, 2022	August 2, 2022
Discovery Cutoff	May 27, 2022	August 5, 2022
Deadline to File Motions in Limine	August 22, 2022	October 31, 2022

Deadline to File Joint Pretrial Statement August 29, 2022 November 7, 2022

Pretrial Conference September 12, 2022 November 21, 2022

Trial Date September 26, 2022 December 5, 2022

DATED THIS 5th day of May, 2020.

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STIPULATED MOTION AND ORDER TO CONTINUE
TRIAL DATE AND PRE-TRIAL DEADLINES - 3

CASE NO. 2:21-cv-00295-BJR

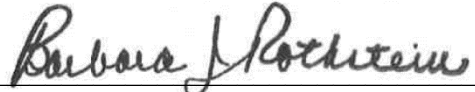
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II. ORDER

Based on the above Stipulation, it is ordered that the new trial date and pre-trial deadlines are the following:

<u>Event</u>	<u>New Date</u>
Deadline to Take Expert Depositions	July 22, 2022
Deadline to File All Dispositive Motions	August 2, 2022
Discovery Cutoff	August 5, 2022
Deadline to File Motions in Limine	October 31, 2022
Deadline to File Joint Pretrial Statement	November 7, 2022
Pretrial Conference	November 21, 2022
Trial Date	December 5, 2022

DATED this 11th day of May, 2022.



BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT JUDGE